

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEBRASKA**

<b>STATE OF NEBRASKA,</b>	)	<b>CASE NO. 4:22CR3018</b>
	)	
<b>Plaintiff,</b>	)	
	)	
<b>vs.</b>	)	<b>DEFENDANT'S MOTION FOR</b>
	)	<b>EXTENSION OF TIME</b>
<b>Christopher Groth,</b>	)	
	)	
<b>Defendant.</b>	)	

COMES NOW the Defendant, Christopher Groth, by and through his attorney of record, and hereby respectfully requests that the time for filing his objections to the Presentence Report and/or any Motions for Downward Departure/Variance, be extended until July 20, 2023. In support of this motion, the undersigned states that:

1. Defense counsel needed additional time to review the Presentence Report;
2. Defense counsel has had a busy trial schedule and other pending matters, which has caused a delay in the filing of Motion for Departure/Variance.

WHEREFORE, Defendant respectfully requests that this Court issue an Order extending the deadline for the objections to the Presentence Report and Motions for Downward Departure/Variance until July 20, 2023.

Respectfully submitted this 19<sup>th</sup> day of July, 2023.

**Christopher Groth, Defendant**

By: /s/ Carlos A. Monzón  
Carlos A. Monzón, #20453  
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**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that on this \_\_\_\_ day of July, 2023, the foregoing Motion for Extension of Time was electronically filed with the Clerk of the Court using the ECM/ECF system, which sent notification of said filing to the following:

Tessie L. Smith  
Assistant U.S. Attorney  
100 Centennial Mall North  
Suite 487  
Lincoln NE 68508

/s/ Carlos A. Monzón  
Carlos A. Monzón, #20453